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17 Attorneys for  
18 TIGER NATURAL GAS, INC.

19 UNITED STATES BANKRUPTCY COURT

20 NORTHERN DISTRICT OF CALIFORNIA

21 SAN FRANCISCO DIVISION

22 In re ) CASE NO. 19-30088 (DM)  
23 PG&E CORPORATION )  
24 -and- ) Chapter 11  
25 PACIFIC GAS AND ELECTRIC ) (Lead Case)  
26 COMPANY, ) (Jointly Administered)  
27 Debtors. )  
28  Affects PG&E Corporation )  
 Affects Pacific Gas and Electric ) **DECLARATION OF LEAH E.**  
29 Company ) **CAPRITTA TIGER NATURAL GAS,**  
30  Affects both Debtors ) **INC.'S REPLY IN SUPPORT OF**  
31 \*All papers shall be filed in the Lead Case, ) **MOTION FOR RELIEF FROM STAY**  
32 No. 19-30088 (DM) ) **PURSUANT TO 11 U.S.C. § 362(d)(1)**  
33 )  
34 ) Date: November 13, 2019  
35 ) Time: 10:00 AM (Pacific Time)  
36 ) Place: United States Bankruptcy Court  
37 ) Courtroom 17, 16<sup>th</sup> Floor  
38 ) San Francisco, CA 94102  
39 )  
40 ) **Objection**  
41 ) **Deadline:** November 8, 2019  
42 ) 4:00 p.m. (Pacific Time)

**DECLARATION OF LEAH E. CAPRITTA**

I, Leah E. Capritta, declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters stated herein. I am an attorney at law licensed to practice in the State of Colorado and admitted pro hac vice to practice before this Court. I am a partner at the law firm of Holland & Knight LLP and am counsel for Tiger Natural Gas, Inc. (“Tiger”). I make this declaration in support of Tiger’s Reply in Support of Motion for Relief from the Automatic Stay. I have personal knowledge of the facts set forth below, and if called and sworn as a witness, I could and would testify competently thereto.

2. A true and correct copy of excerpts from Michael Quinn, Ph.D.'s deposition, dated September 29, 2017, have been filed under seal contemporaneously herewith.

3. A true and correct copy of excerpts from Daniel W. Ray's deposition, dated October 4, 2017, have been filed under seal contemporaneously herewith.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: November 11, 2019

HOLLAND & KNIGHT LLP

By: /s/ Leah E. Capritta  
Leah E. Capritta

*Attorneys for Tiger Natural Gas, Inc.*